

Hazardous Waste and Toxics Reduction Program
Dangerous Waste Regulations Self Audit Checklist

This checklist is a self-audit tool. It includes many of the dangerous waste (DW) regulations examined in a routine compliance inspection. It does not meet any of the dangerous waste inspection requirements [e.g., WAC 173-303-320(1): general facility inspections or WAC 173-303-630(6): weekly dangerous waste accumulation area inspections].

The list is broken down into sections applying to:

- All Generators
- Small Quantity Generators (SQG)
- Medium (MQG) and Large Quantity Generators (LQG)
- Large Quantity Generators Only

RCRA Site ID	Facility Name	Self Audit Date
Generator Status	Name of person conducting audit	

Summary of Requirements Applicable to All Generators				
WAC Code 173-303-			OK?	
Used Oil and Spent Antifreeze	515(4)	Used oil managed as on-spec meets the used oil specification standards. [ref 40 CFR 279.61(a)]		<input type="checkbox"/>
	515(5)(e)	Used oil mixed with dangerous waste is managed as dangerous waste.		<input type="checkbox"/>
	515(6)	Containers or tanks of used oil are labeled with the words "Used Oil." [ref 40 CFR Part 279.22(c)(1)]		<input type="checkbox"/>
	515(6)	Oil spills are cleaned up immediately. [ref 40 CFR 279 Part 279.22(d)]		<input type="checkbox"/>
	515(6)	Generator is burning their own used oil or oil from a do-it-yourselfer in a unit with a maximum capacity of 0.5 M BTU per hour vented to the ambient air. [ref 40 CFR Part 279.23]		<input type="checkbox"/>
	515(6)	Used oil is transported to an aggregation point or a permitted collection center. [ref 40 CFR 279.24]		<input type="checkbox"/>
	515(6)(a)(i)	Containers of used oil are kept closed except to add or remove used oil.		<input type="checkbox"/>
	515(6)(b)	Used oil is managed in a manner that poses no threat to human health and the environment, and secondary containment is provided.		<input type="checkbox"/>
	522(2)(a)	Antifreeze containers are labeled "Spent Antifreeze," and stored in a manner to prevent spills. (For example, in compatible containers, on impermeable surfaces or in secondary containment structures.)		<input type="checkbox"/>
Universal Waste (UW)	573(9)	SQHUW ¹ :	UW is managed in a way that prevents releases to the environment.	<input type="checkbox"/>
	573(10)	<11,000 lbs Total UW & < 2,200 lbs of UW Lamps	UW waste is properly labeled or marked "Universal Waste," "Waste," or "Used" followed by the words "Battery(ies)," "Mercury-containing Equipment" or "Lamps."	<input type="checkbox"/>
	573(11)		UW is only accumulated for up to one year and documentation of storage time is provided, except as noted in -573(11)(b).	<input type="checkbox"/>
	573(20)	LQHUW ² :	UW managed in a way that prevents releases to the environment.	<input type="checkbox"/>
	573(21)	>11,000 lbs Total UW or >2,200 lbs of UW Lamps	UW waste properly labeled or marked "Universal Waste," "Waste," or "Used" followed by the words "Battery(ies)" "Mercury-containing Equipment" or "Lamps."	<input type="checkbox"/>
	573(22)		UW may be accumulated for up to one year, except as noted in -573(22)(b). Documentation must exist to demonstrate that the time limits have been met.	<input type="checkbox"/>

¹ Small Quantity Handler of Universal Waste

² Large Quantity Handler of Universal Waste

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WAC Code 173-303-		OK?	
Waste Management	016(5)(d)(ii)	No Speculative Accumulation: used 75% of accumulated recyclable material within a calendar (January through December) year.	<input type="checkbox"/>
	070(4)	Waste streams are designated for state criteria, when required.	<input type="checkbox"/>
	070(6)	All appropriate DW numbers are used to designate a waste stream. [ref by -170(1)]	<input type="checkbox"/>
	070(7)(c) [MQG, LQG] or 070(8)(a)(i) [SQG]	All required DW is counted when making quantity determinations.	<input type="checkbox"/>
	170(1)(a) [MQG, LQG] or 070(8)(b)(i) [SQG]	Waste streams are properly designated following the procedures specified in -070(3).	<input type="checkbox"/>
	081(3) or 082(3)	Solid waste contaminated with a DW is managed as DW.	<input type="checkbox"/>
Storm water	RCW 90.48.080	There is no discharge of polluting matter to waters of the state.	<input type="checkbox"/>
	Spills	145(2)	Spills to the environment are reported to Ecology immediately.
145(3)		Spill or discharges of DW or hazardous materials are appropriately mitigated or controlled.	<input type="checkbox"/>

Additional SQG Requirements

SQG generates <220 lbs (100kg; 27 gal) DW and <2.2 lbs (1 kg) of AHW³ and WT01 wastes per month; stores <2,200 lbs (1,000 kg; 270 gal) DW and <2.2 lbs (1 kg) of WT01 and AHW on site

SQGs	070(8)	Quantity of DW on site is below the regulatory threshold (2,200 lbs).	<input type="checkbox"/>
	070(8)(b)(ii)	Waste is managed safely and poses no threat to human health or the environment.	<input type="checkbox"/>
	070(8)(b)(iii)	SQG waste is either treated or disposed in an on-site facility, or delivery to an authorized off-site facility is ensured.	<input type="checkbox"/>
	070(8)(b)(iv)	If the site has an EPA ID Number, they submit a DW Verification form annually.	<input type="checkbox"/>

Additional MQG and LQG Specific Requirements

MQG generates 220-2,200 lbs (100-1,000kg; 27-270 gal) per month DW; stores <2,200 lbs (1,000 kg; 270 gal) DW and <2.2 lbs (1 kg) of WT01 and AHW on site

Recordkeeping	060(1)	Site has a valid EPA/State ID Number (www.ecy.wa.gov/programs/hwtr/waste-report/notification.html).	<input type="checkbox"/>
	060(2)	Revised DW Site ID form is submitted if company name or mailing address changes.	<input type="checkbox"/>
	060(5)	Annual DW reports are submitted each year. [ref by -170(2)]	<input type="checkbox"/>
	140(2)(a)	Land Disposal Restriction (LDR) records are kept three years from the date each type of hazardous waste was last sent to on-site or off-site treatment, storage, or disposal. [per 40 CFR 268.7(a)(8)]	<input type="checkbox"/>
	170(3)(b)	Treatment by generator logs are kept five years with dates and the amount of waste treated. [ref by -210(4)]	<input type="checkbox"/>
	180(1)	Uniform hazardous waste manifests are completed properly. [ref by -170(2)]	<input type="checkbox"/>
	210(1)	Signed manifests are kept for five years. [ref by -170(2) and -180(3)]	<input type="checkbox"/>
	210(2)	Copies of DW annual report and/or exception reports and Site ID Form are kept on site for five years. [ref by -170(2) and -220]	<input type="checkbox"/>
	210(3)	Waste designation records are kept for five years. [ref by -170(1) & -170(2)]	<input type="checkbox"/>
	220(1)	Annual DW reports are completed according to instructions. [ref by -170(2) & -060(5)]	<input type="checkbox"/>

³ Acutely Hazardous Waste

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WAC Code 173-303-		OK?	
Recordkeeping, continued	220(2)	Exception reports are filed with Ecology when a signed manifest is not received from the treatment, storage, and disposal facility (TSD) within 45 days. [ref by -170(2)]	<input type="checkbox"/>
	300(5)	Waste analysis plan (WAP) is on site to comply with the permit by rule requirements of -802(5).	<input type="checkbox"/>
	200(1)(f)	Required WAP is present when treating waste to meet LDR treatment standards (40 CFR 268.7(a)(5)).	<input type="checkbox"/>
Waste management	141(1)	DW is shipped to an authorized TSD facility for disposal or a facility authorized to receive DW.	<input type="checkbox"/>
	200(1)(d)	DW is properly labeled as "Hazardous Waste" or "Dangerous Waste" and with major risk. [ref by -170(2)]	<input type="checkbox"/>
	630(2)	Containers are in good condition (not rusted or defective). [ref by -200(1)(b)]	<input type="checkbox"/>
	630(3)	Containers are properly labeled with major risk and old labels are removed from empty containers. [ref by -200(1)(b)]	<input type="checkbox"/>
	630(4)	Containers are not reactive with contents. Contents are not reactive when mixed. [ref by -200(1)(b)]	<input type="checkbox"/>
	630(5)(a)	Containers are kept closed unless removing or adding waste. [ref by -200(1)(b)]	<input type="checkbox"/>
	630(5)(c)	Minimum aisle space of 30 inches between rows of drums is maintained. [ref by -200(1)(b)]	<input type="checkbox"/>
	630(6)	DW accumulation areas are inspected weekly and an inspection log is maintained. [ref by -200(1)(b)]	<input type="checkbox"/>
	630(7)	Containers of liquid DW have adequate secondary containment. [ref by -200(1)(b)]	<input type="checkbox"/>
	630(8)(b)	Containers holding ignitable or reactive waste are stored according to International Fire Code. [ref by -200(1)(b)]	<input type="checkbox"/>
	630(9)	Incompatible dangerous wastes are stored properly separated. [ref by -200(1)(b)]	<input type="checkbox"/>
	200(1)(c)	Containers of DW are marked with the accumulation start date. [ref by -170(2)]	<input type="checkbox"/>
	200(2)(a)	Satellite Accumulation Areas (SAAs) are managed correctly. [ref by -170(2)] (a) SAAs do not exceed 55 gal, (b) are immediately dated when full, (c) are kept in good condition and compatible with wastes, and (d) are kept closed.	<input type="checkbox"/>
	200(2)(b)	>55 gal SAA waste is moved to a final accumulation area within three days. [ref by -170(2)]	<input type="checkbox"/>
	201(2)(a) [MQG only]	DW is disposed of within 180 days of accumulation. [ref by -170(2)]	<input type="checkbox"/>
	505(2)(c)	Land Disposal Restrictions are complied with.	<input type="checkbox"/>
802	Permit by Rule requirements are complied with.	<input type="checkbox"/>	
202 [MQG only]	For tanks, comply with -202.	<input type="checkbox"/>	
Preparedness, Prevention, and Training	201(2)(c)(i)	Designated emergency coordinator is on the premises or on call at all times. [ref by -170(2)]	<input type="checkbox"/>
	201(2)(c)(ii) [MQG only]	Posted near a communication device: Emergency Coordinator's name and phone number, Fire Dept. phone number, locations of fire extinguishers, spill control materials, and any fire alarm equipment. [ref by -170(2)]	<input type="checkbox"/>
	201(2)(c)(iii) [MQG only]	The generator must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies.	<input type="checkbox"/>
	320(1)	General facility inspections are conducted. [ref by -200(1)(e)]	<input type="checkbox"/>
	320(2)	General facility inspection schedule is developed and followed. [ref by -200(1)(e)]	<input type="checkbox"/>
	320(2)(b)	General facility inspection schedule identifies types of problems to look for. [ref by -200(1)(e)]	<input type="checkbox"/>
	320(2)(c)	The frequency of inspection is specified in the general facility inspection schedule. [ref by -200(1)(e)]	<input type="checkbox"/>
	320(2)(d)	The general facility inspection log or summary is kept for five years after the inspection. [ref by -200(1)(e)]	<input type="checkbox"/>
340(1)	Emergency equipment is provided and maintained in dangerous waste accumulation areas. [ref by -200(1)(e)]	<input type="checkbox"/>	

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WAC Code 173-303-			OK?
Section continued	340(2)	Communication devices and/or alarms are provided during dangerous waste handling. [ref by -200(1)(e)]	<input type="checkbox"/>
	340(4)	Arrangements with local authorities for emergency assistance and response are made and documented. [ref by -200(1)(e)]	<input type="checkbox"/>
Add			<input type="checkbox"/>
			<input type="checkbox"/>

Additional LQG Requirements			
LQG generates (per month) or stores > 2,200 lbs (1,000 kg/270 gals) DW on site, or generates (per month) or stores >2.2 lbs (1 kg) WT01 or AHW on site			
Accumulation Time Limit	200(1)(a)	DW accumulated on site for not more than 90 days. [ref by -170(3)]	<input type="checkbox"/>
Planning	350(2)	A contingency plan is prepared. [ref by -200(1)(e)]	<input type="checkbox"/>
	350(3)	Contingency plan is adequate, maintained, and available. The contingency plan contains the required elements of this section. [ref by -200(1)(e)]	<input type="checkbox"/>
	350(4)	Copies of the contingency plan are kept at the facility and submitted to local emergency response agencies.	<input type="checkbox"/>
	350(5)	The contingency plan is maintained and amended when necessary.	<input type="checkbox"/>
Training	330(1)	A program of classroom or on-the-job training provided. [ref by -200(1)(e)]	<input type="checkbox"/>
	330(2)	A written dangerous waste training plan is prepared, adequate, available, and maintained. [ref by -200(1)(e)]	<input type="checkbox"/>
	330(3)	Personnel training records are adequately maintained. [ref by -200(1)(e)]	<input type="checkbox"/>
DW Tanks	640(3)	A written tank assessment certified by an independent, qualified registered professional engineer is on file and a schedule for on-going assessments has been developed and implemented.	<input type="checkbox"/>
	640(4)(b)(i)	Tank secondary containment will prevent waste migration.	<input type="checkbox"/>
	640(4)(b)(ii)	Tank secondary containment is capable of detecting and collecting releases.	<input type="checkbox"/>
	640(4)(c)(i)	Tank secondary containment is made of compatible materials of sufficient strength.	<input type="checkbox"/>
	640(4)(c)(ii)	Tank secondary containment has an adequate foundation.	<input type="checkbox"/>
	640(4)(c)(iv)	Tanks secondary containment is free of waste and precipitation (removed within 24 hours.)	<input type="checkbox"/>
	640(5)	Tank Operating Requirements: spill and overflow protection (b); labeled with major risk visible from 50 feet(d); captures toxic vapors (e) [as ref by -200(1)(b)]	<input type="checkbox"/>
640(6)	Daily inspections of tanks are performed (b). Overfill controls as scheduled (a) and cathodic protection systems as described are inspected. Logs of all inspections are kept for five years per - 640(6)(d).	<input type="checkbox"/>	
Add			<input type="checkbox"/>
			<input type="checkbox"/>

To ask about available formats for the visually impaired please call the Hazardous Waste and Toxics Reduction Program at 360-407-6700. Persons with hearing loss can call 711 for Washington Relay Service. Persons with a speech disability can call 877-833-6341.